

Reforming the homelessness service system in NSW

Improving responses for victim-survivors of domestic and family violence

February 2025



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Acknowledgement

This report was written on the stolen and unceded lands of the Gadigal People of the Eora Nation. We pay respects to the Elders past, present and emerging.

Domestic Violence NSW acknowledges Aboriginal and Torres Strait Islander peoples as the first sovereign nations across the breadth and depth of Australia. We recognise that Aboriginal and Torres Strait Islander people have lived and cared for Country for over 60,000 years and continue to do so, honouring ancestors and knowledge holders within community, and observing ancient cultural practices.

We acknowledge the damaging impacts of colonisation and hold their stories with great care.

We acknowledge that domestic and family violence are not part of Aboriginal culture and assert that the responsibilities of Aboriginal families and kinship systems do not align nor are reflected in current government policies. We work to position ourselves as allies and give voice and strength to the unique position that Aboriginal and Torres Strait people hold in their own family systems and communities.



About us

Domestic Violence NSW (DVNSW) is the peak body for specialist domestic and family violence (DFV) services in NSW. With over 180 member organisations across the state and diverse lived expertise advisory groups, we work to improve policy, legislative and program responses to domestic and family violence through advocacy and collaboration, while promoting good practice and primary prevention.

We exist to eliminate domestic and family violence from society.

DVNSW members represent the diversity of NSW specialist DFV services, working to support adults, children, families and communities impacted by domestic and family violence. Our member organisations consist of services such as crisis and refuge specialist homelessness services, domestic violence response enhancement, specialist DFV case management, Aboriginal controlled organisations, migrant and refugee specialist organisations, community housing, staying home leaving violence, women's legal and women's court advocacy services, men's behaviour change programs, and general community, women and children's support programs. It's our role to ensure our members are listened to, respected and heard by the change-makers in society.

We recognise that lived experience is central to change. We understand that DFV impacts some communities disproportionately – which is why we ensure the experiences of Aboriginal and Torres Strait Islander people, LGBTIQ+ people, migrant and refugee people and people with disability have a central voice in our advocacy. With guidance from lived experts, we elevate the experiences, voices and needs of victim-survivors through all work we undertake.

Together with victim-survivors, our members, our partners and our team – we will end gender-based violence in NSW.

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A note on terminology

Domestic violence

Interpersonal violence or abuse perpetrated by an intimate partner or ex-partner. Domestic violence can include a variety of forms of abuse including but not limited to, physical, sexual, psychological, financial abuse, physical stalking, and intimidation. Domestic violence is gendered and is most commonly underpinned by coercive control, which is a pattern of behaviour utilising many different tactics to create a web of entrapment, often involving the exploitation of power imbalances.

Family violence

Violence perpetrated by a family member, carer, guardian, child, or kinship carer. Family violence can include a variety of forms of abuse including but not limited to, physical, sexual, psychological, financial abuse, physical stalking, and intimidation. Family violence is gendered and is most commonly underpinned by coercive control, which is a pattern of behaviour utilising many different tactics to create a web of entrapment, often involving the exploitation of power imbalances.

Gendered violence

Gendered violence or gender-based violence refers to harmful acts directed at an individual or a group of individuals because of their gender. It is rooted in gender inequality, the abuse of power and harmful norms. The term is primarily used to draw attention to the fact that structural, gender-based power differentials place women and girls at risk for multiple forms of violence. While women and girls suffer disproportionately from gendered violence, men and particularly boys can also be victims. The term is inclusive of LGBTIQ+ populations, referencing violence related to norms of masculinity/femininity and/or gender norms.

Intimate Partner Violence (IPV)

Abuse perpetrated by a current or former intimate partner such as a partner, husband, wife, girlfriend, boyfriend, or person who someone is dating. Term is often used interchangeably with domestic violence.

People with lived expertise

People with lived expertise are people who have experience of sexual, domestic and/or family violence whose expertise as context experts due to their lived experience is noted.

Specialist sexual, domestic, and family violence sector

The specialist sexual, domestic, and family violence sector includes crisis and refuge services, transitional accommodation and community housing providers, family support services, Aboriginal controlled organisations, specialist multicultural community organisations, specialist LGBTIQ+ organisations, counselling services, sexual violence services, specialist homelessness service providers, men's behaviour change programs and networks, community organisations working with high-risk communities, specialist women's legal and support services, women's health centres, women and children's support services, Safe at Home programs and the Women's Domestic Violence Court Advocacy Services.

Victim-survivor

Victim-survivor refers to a person who is being or has experienced violence, acknowledging that people who have been victimised are survivors and are also victims of crime. We acknowledge that people who

have been victimised are survivors and are also victims of crime. This is not intended as an identity term. In the specialist domestic and family violence sector, the preferred term is victim-survivor.

DVNSW notes that the justice sector and legislation use the term victim. In this submission, although used interchangeably, the emphasis has been placed on the term victim-survivor, with victim used at times particularly when discussing the justice system or legislation.

Coercive control

Coined by Evan Stark, Buzawa and Stark (2017, p. 105) define coercive control as “a strategic course of gender-based abuse in which some combination of physical and sexual violence, intimidation, degradation, isolation, control and arbitrary violations of liberty are used to subjugate a partner and deprive her of basic rights and resources”. This web of abuse has the end goal of entrapment and is a conscious, concerted effort by the abuser. Also known as intimate terrorism, this coercive control is the foundational underpinning of domestic and family violence, not simply another form of violence. Another way to think about this comes from Emma Katz, who describes coercive control as a toolbox, and the forms of abuse (financial, technological, humiliation and degradation etc.) as the individual tools. This is different to rarer instances of situational couple violence, which can be just as lethal, but are not motivated by the desire to entrap their victim.

Executive summary

Domestic and family violence (DFV) is the leading cause of homelessness in Australia (AIHW 2024). In NSW, almost 5000 were forced to choose between staying in unsafe and violent homes or becoming homeless, due to a lack of safe and affordable housing alternatives. Almost half became homeless, while the other half returned to violent partners because they could not find secure stable housing (Equity Economics 2021).

In NSW, Specialist Homelessness Services (SHS) crisis accommodation remain the primary response for victim-survivors of DFV experiencing homelessness. DFV is the main reason women experiencing homelessness seek SHS assistance in NSW (AIHW, 2024). The SHS system is under immense pressure, overstretched and underfunded. In 2023-2024, close to 21,000 requests for assistance were unmet, a 130% increase since 2019-20 (AIHW, 2024). While SHSs assisted close to 68,000 clients in 2023-2024, and almost 26,000 (38%) were experiencing DFV, only 2% were assisted into permanent housing (AIHW, 2024). This low rate can be attributed to the lack of long-term affordable housing options.

Additionally, the true extent of homelessness among women is not fully captured in SHS data, due to the hidden nature of women's homelessness, with victim-survivors often couch surfing or living in their car as they are unable to access services.

The Draft Homelessness Strategy (the Strategy) is largely focused on delivering more social, affordable and key worker housing for NSW. While this focus is important, the Strategy must also address the urgent need to reform and adequately fund the Specialist Homelessness Services (SHS) system. The 2024-25 budget commitment and significant investment in social and affordable housing cannot be at the expense of the SHS system.

The Strategy must increase the focus on DFV to ensure:

- Victim-survivors receive appropriate tailored responses.
- Systemic drivers of homelessness are addressed.
- Investment in crisis responses while working towards prevention.
- Commitment to a whole-of-government response.

Our recommendations urge for a Homelessness Strategy that is flexible, well-resourced and meets the needs of victim-survivors experiencing DFV and homelessness. This includes:

- Expanding social, transitional and meanwhile use housing including commensurate funding for wrap-around support.
- Increasing baseline funding for all specialist DFV homelessness services, including providing a loading for regional, remote, migrant and refugee services.
- Investing in flexible housing and support models that address the specific needs of marginalised communities including Aboriginal communities, older women, regional and remote communities, women with disability, and women on temporary visas.
- Ensure people with lived expertise inform practice and policy.

DVNSW would like to thank to members of our Migrant and Refugee Advisory Committee, Lived Expertise Policy Advisory Committee, Aboriginal Policy Officer, and member services who informed our advocacy for this submission. This submission is endorsed by Full Stop Australia, the national peak body and leading provider of sexual assault services.

Key recommendations

1. Reform the social and affordable housing system so it is fit for purpose to accommodate the people who need it the most:
 - a. Deliver a social housing target of a minimum of 10% of occupied residential dwellings by 2050.
 - b. Allocate social housing properties to be used as transitional housing for a period of up to three years for women and children exiting DFV refuges.
 - c. Increase the availability of transitional housing properties for victim-survivors by providing incentives to private developers to fast-track the availability of meanwhile use accommodation.
2. Prioritise a 50 per cent baseline funding increase (\$74.7 million in 2025-26) for all domestic and family violence services funded to provide homelessness support, so that frontline services have sufficient resourcing to meet demand.
3. Provide a loading to all specialist homelessness services operating in regional, rural and remote locations in NSW.
4. Provide a loading to women's refuges to fund support for migrant and refugee victim-survivors of domestic and family violence from non-English speaking backgrounds.
5. Invest in flexible models of housing that address the specific needs of marginalised communities with commensurate support funding.
6. Increase the number of Aboriginal Community Controlled Organisations (ACCO) and Aboriginal Community Housing Providers (ACHPs) and increase funding to Aboriginal specialist DFV services to address the high rates of DFV and homelessness.
7. Embed mandatory cultural awareness training and cultural safety frameworks within all homeless and housing organisations, as well as other responders including health and mental health services and child protection.
8. Fund holistic models of support including whole-of-family work and remove restrictive funding constraints for Aboriginal and mainstream DFV and homelessness services.
9. Fund a specialist older person's housing information and support service that comprises both an early intervention and crisis response, similar to the Housing for the Aged Action Group 'Home at Last' model in Victoria.
10. Implement needs-based funding models for crisis, transitional and social housing in regional and remote NSW, rather than allocating funds solely on population size.
11. Make all types of housing – temporary, crisis, transitional and social – fully accessible, including wheelchair access, adjustable kitchen benchtops, and flexible design. Retrofit existing housing to meet accessibility standards.
12. Extend eligibility for women on temporary visas to the broader NSW housing and homelessness system, including access to social and affordable housing and temporary accommodation.
13. Provide ongoing DFV and trauma-informed training for Homes NSW staff and prioritise consultation and co-design opportunities for people with lived expertise to improve customer service responses to people experiencing homelessness.
14. Implement a lived expertise advisory group to inform the design and delivery of homelessness policy, programs, service specifications and delivery across the life of the Strategy.

High level feedback on the strategy

Increase the Strategy's focus on domestic and family violence

The overarching vision for the Strategy, *Homelessness is rare, brief and not repeated because people have a safe home and the support to keep it*, is optimistic but somewhat limiting, as it doesn't allow for recognition or exploration of the many drivers of homelessness beyond an initial mention.

While we appreciate the focus on Aboriginal communities and young people, who are overrepresented and at greater risk of homelessness, the exclusion of women and children experiencing DFV is concerning. DFV is the leading cause of homelessness in NSW and Australia (AIHW 2024), and the Strategy must specifically address the needs of this priority cohort. Currently, DFV is only mentioned as a driver of homelessness and in the context of the existing state and federal plans to prevent and respond to DFV, with no direct integration into the Homelessness Strategy. We recommend that the Strategy references DFV throughout, including in all three focus areas: *"Homelessness is rare"*, *"Homelessness is brief"*, and *"Homelessness is not repeated"*. It should also be incorporated into all corresponding outcomes, targets, and action plans that follow.

Work towards prevention while increasing investment in crisis responses

The bold and ambitious principles guiding the Strategy are commendable, but the NSW Government must ensure these principles are not merely symbolic. They should be embedded into every aspect of the Strategy, from recommissioning and service design to delivery, resource allocation, and future investments over the Strategy's lifespan.

The inclusion of prevention in the Strategy is a positive step, but prioritising prevention at the expense of crisis support poses a significant risk to the SHS system. Many services are stretched, supporting clients in crisis at rates of 200-300% higher than their funding levels. The system is unable to meet current demand, with 20,825 requests for support going unassisted, a 130.8% increase from 2019-20 to 2023-24 (AIHW, 2024).

Therefore, the pivot to prevention must be gradual. The crisis response system requires substantial funding to stabilise it, in order to address the turn away rates and to ensure that services can meet demand. Without this investment, a crisis-driven response will persist.

Women and children experiencing DFV require an immediate crisis response due to the nature of DFV. Victim-survivors leaving an intimate partner relationship face increased levels of risk making timely access to safe crisis accommodation and wrap-around support essential. Without appropriate crisis responses, women and children experiencing DFV will be at greater risk of serious harm and death. In 2024, 76 women were reported to have been murdered in Australia because of DFV, with 25 of these women being killed in NSW (Counting Dead Women Australia, 2024). This is the highest national toll in nine years.

Commit to a whole of government approach

A Homelessness Strategy that allows for regional implementation, whole-of-government leadership, and coordination is essential to reducing high rates of homelessness and the related impacts of DFV, including death, disability and injury.

While the Strategy acknowledges the housing and homelessness system (the system) working alongside other government systems (such as health, child protection, education, corrections, aged care, disability, and income support), the focus areas and outcomes prioritised in the draft Strategy do not address how these intersecting government departments will contribute to the Strategy. Further, NSW and Commonwealth strategies and reforms are represented in an infographic depicting the Homelessness Strategy in the centre, but the connection between the strategies are not fully explained in the Strategy.

The Strategy should outline a cohesive whole-of-government response that addresses the drivers and systemic factors contributing to homelessness, clearly defining the roles and responsibilities of different levels of government and departments, and the ways they interact.

We would like to see commitment to ensure that NSW Government departments work together to ensure that policies are consistent, and that the Strategy can be implemented across government departments. This will require increased leadership by the NSW government and a comprehensive governance framework. The Department of Communities and Justice (DCJ) should lead the Strategy, with adequate investment and explicit recognition of the roles and responsibilities of the other government departments.

Measuring impact and governance

The success of the Strategy hinges on the Homelessness Outcomes Measurement and Reporting Framework. Clear, quantitative, and measurable targets should be outlined in the action plans, informed by the indicators developed to monitor outcomes across the focus areas.

Monitoring and reporting should align with the upcoming National Housing and Homelessness Plan and the National Agreement on Social Housing and Homelessness (2024-2029).

DVNSW recommends the following actions:

- Consult with DVNSW and other peaks on developing the Outcomes Measurement and Reporting Framework, action plan targets, and the evaluation plan.
- Ensure a consistent approach to homelessness data collection across NSW government departments.
- Provide clearer communication of trends arising from both state-based and national data sources.
- Develop targets for the provision of services and the effectiveness of supports received by victim-survivors through the SHS and housing system – and relevant data sources – are developed in consultation with the specialist DFV service sector.
- Include qualitative data sources, such as input from services and peak organisations, in the action plans and evaluation plan.
- Ensure comprehensive evaluation of all initiatives the Strategy resources, ideally embedded within program design and funded accordingly.
- Establish accountability for implementing the Strategy through a funded participatory body that includes NGO representatives, government officials, and those with lived expertise.
- Ensure cabinet-level leadership to guarantee all portfolio areas are committed to and accountable for implementing the Strategy, with central agencies actively supporting the implementation process.
- Empower peak bodies to improve the transparency and accountability of government policies, programs, funding, and evaluation, and provide them with the necessary resources to do so.

Strategy focus areas

Homelessness is rare: wherever possible, homelessness is prevented from happening in the first place, making it rare

To make homelessness rare, NSW should prioritise reimagining social housing to ensure it is fit for purpose and serves the people who need it the most, particularly victim-survivors of DFV. This includes increasing availability of meanwhile use properties, adopting a more flexible approach to social housing to increase the availability of transitional housing options, and increasing investment in social housing. These actions will create more exit pathways from refuges for women and children experiencing DFV, providing them with the safety and stability necessary to begin recovering from trauma.

Reimagining social housing

The current social and affordable housing system is not fit for purpose and fails to serve the people who need it most. Due to a significant shortage of available social and affordable housing, only clients with the most complex needs and very low incomes are eligible for these housing supports. To achieve outcome *1.1 People can get and keep a safe and affordable home*, and outcome *2.3 People are supported out of homelessness into longer-term housing with tailored support*, the government will need to commit to substantial additional investment. This investment should supplement the funding announced in the 2024-25 NSW Government budget to increase housing stock beyond current targets, including commensurate funding for wrap-around support.

The Strategy must prioritise more flexible and innovative models of social housing for priority cohorts. Many women and children experiencing DFV rely on women's refuges for accommodation and wrap around case management support during times of crisis. Significant investment has been made in new Core & Cluster refuges, which will bring the total number of refuges in NSW to 138 – an important and much needed investment. However, the lack of exit pathways from refuges for victim-survivors has created a bottle neck.

Many victim-survivors nearing the end of a three-month refuge stay are not eligible for social or affordable housing as they do not meet income requirements. Most cannot secure a property in the highly competitive private rental market, where landlords typically prefer tenants on higher incomes. As a result, women exiting refuges often have very limited accommodation options.

Meanwhile use housing

We welcome the NSW government's changes to zoning and development approvals, which aim to remove some of the red tape and allow redevelopments for meanwhile use properties to become available more quickly. This could provide additional transitional housing for women experiencing DFV. However, to further increase supply of transitional housing properties for victim-survivors, the NSW government should offer more incentives to private developers to fast-track the availability of meanwhile use accommodation. Expanding transitional housing in regional and rural areas, especially where the new Core and Cluster refuges are being built, will create exit pathways where they are most needed. However, creating more meanwhile use transitional properties will only provide medium-term housing for a few years before redevelopment, meaning they are likely to only house one family per property.

Transitional housing

There is a critical need for more permanent transitional housing to address the bottleneck in refuges caused by the lack of exit pathways. The NSW government should adopt a flexible approach to social and

affordable housing by allocating vacant social homes as transitional housing for a period of up to three years for women and children exiting refuges. This would help alleviate the bottleneck in the refuge system caused by limited exit options and would also ensure that social housing properties are not left vacant, as is currently the case for many.

Transitional housing plays a crucial role in the homelessness service system, offering stability and independence for women who have experienced DFV., allowing them to begin recovering from trauma. This process takes considerable time, particularly for women with children, who may be navigating new schools, legal matters such as family law matters, apprehended domestic violence orders (ADVO), or migration law challenges for women on temporary visas. Transitional housing can provide stability and case management support for two to three years, helping victim-survivors move into the private rental market. However, the provision of transitional properties is notably absent from the current Strategy.

The Homes NSW portfolio includes only 1,500 transitional properties across the state, most of which are reserved for women and children experiencing DFV. Unfortunately, these properties are rarely available due to long stay lengths, typically two to three years, while women experiencing DFV are often expected to exit a crisis refuge in only three months. Women on temporary visas are even more reliant on transitional housing as a step out of crisis refuges as they are ineligible for housing support through the broader Homes NSW system.

Increased investment in social housing

While we welcome the Commonwealth and NSW government investment in social housing for NSW, the targets remain insufficient to meet the current need amidst the housing crisis. The rising cost of living, mortgage rates, rental increases, and stagnant wages have put more people at risk of homelessness than ever before. In 2023-23, only 2% of clients who received SHS support were able to access the long-term housing they needed (AIHW 2024).

When building more social housing properties, the government must consider its suitability by adopting trauma informed design principles, incorporating appropriate safety and privacy measures, noise control, proximity to amenities, public transport and health services, providing access to green outdoor spaces and additional space for exercise, work, study, and hobbies.

We support Homelessness NSW's recommendation for the NSW government to set a social housing target of at least 10% of occupied residential dwellings by 2050.

Recommendation 1: Reform the social and affordable housing system so it is fit for purpose to accommodate the people who need it the most:

- a. Deliver a social housing target of a minimum of 10% of occupied residential dwellings by 2050.**
- b. Allocate social housing properties to be used as transitional housing for a period of up to three years for women and children exiting DFV refuges.**
- c. Increase the availability of transitional housing properties for victim-survivors by providing incentives to private developers to fast-track the availability of meanwhile use accommodation.**

Homelessness is brief: when homelessness does occur, people are quickly connected to housing and the supports they need

To make homelessness brief, NSW should prioritise meeting the demand for existing services to ensure that all victim-survivors of DFV are able to access crisis accommodation with wrap-around support. DFV was the leading reason clients sought assistance from SHSs in 2023-24, however, only 37% of clients who needed crisis or emergency accommodation were able to access it (AIHW, 2024). The NSW government must prioritise a baseline funding increase for services across the state and provide a loading for regional and remote services and those supporting people from migrant and refugee backgrounds, to recognise the higher cost of providing services in those communities.

A baseline funding increase for all specialist DFV homelessness services

A baseline funding increase for specialist DFV refugees has remained absent in state budgets to date. Yet, domestic and family violence rates in NSW continue to rise, and many SHSs and specialist DFV services are stretched to capacity and unable to meet demand. We welcome the inclusion of the guiding principle, the *workforce is strong and supported*, particularly given the current environment where the homelessness workforce is facing a resourcing crisis. However, to meet *Outcome 2.2. People get safe crisis accommodation with appropriate support when they need it*, the NSW government must prioritise a substantial funding increase for the DFV sector.

In 2023-24 there was a 47% increase in people receiving SHS assistance due to DFV compared to the 2011 census data (AIHW 2023), and a 6.5% rise in DFV-related assaults (BOCSAR 2024).

A survey of 17 women's refuges conducted by DVNSW in 2024 further highlighted the growing demand for support. For example, one regional service spanning across three locations saw a 48% increase in referrals since the previous year, while an urban service experienced a 43% increase in monthly client numbers.

This increase in demand has widened a pre-existing gap between demand for and supply of specialist DFV refugees. That gap is now substantial. According to the DVNSW survey, one service reported unaccommodated clients from 60 per 100 in 2022-23 to 96 per 100 in 2023-24, alongside a 59% rise in children needing support. A regional service supported 319 case management and 84 case coordination referrals, despite only receiving funding for 40 and 22 clients, respectively.

However, the data likely underrepresents the true need, as many people may not seek support due to various barriers. These barriers include a lack of local services in regional and remote areas, insufficient culturally appropriate support, and overwhelmed services that are unable to answer the phone or respond to requests. A survey of 23 SHSs across Australia conducted in September 2024 found that 39% of services were forced to close their doors to people seeking help at least once during the fortnight, and 83% of services were unable to answer phone calls for some period during the survey, leaving people in crisis without immediate assistance (Impact Economics, 2024).

Similarly, almost two thirds of respondents to the 2024 NCOSS Survey on Sector Sustainability reported that their costs exceeded the funding received (NCOSS 2024). This chronic underfunding threatens the sustainability of services and the wellbeing of workers, leaving many organisations at significant risk of failure, with funding that does not cover the cost of contracted service delivery, and inadequate indexation.

A 50% baseline funding boost will ensure frontline services are adequately resourced to meet growing demand and provide immediate and long-term specialist support for those experiencing DFV and in

desperate need of safe accommodation. This increase would ensure that specialist services are sufficiently funded to meet contracted service delivery requirements and adequately support their staff.

In addition to a baseline funding increase, existing refuges funded outside of the Core and Cluster model require urgent maintenance and refurbishment. DVNSW members have reported that older communal refuges need updated bathroom and kitchen facilities, along with new carpets and floorings. Many families are forced to share one or two kitchens and bathrooms, which does not provide the privacy and dignity needed to recover from trauma. To address this, older communal style refuges should gradually be replaced by the individualised Core and Cluster design, so that all refuges meet the same standards, avoiding a two-tier system. If this is not feasible due to NSW Government budget restrictions, we recommend that the NSW government provide funding for their maintenance and refurbishment in the interim.

Recommendation 2: Prioritise a 50% baseline funding increase (\$74.7 million in 2025-26) for all domestic and family violence services funded to provide homelessness support, so that frontline services have sufficient resourcing to meet demand.

This funding recommendation includes specialist women's homelessness services and refuges (excluding funding under the Core and Cluster program), Domestic Violence Response Enhancement and Specialist Workers for Children and Young People in refuges.

Impact Economics and Policy (2024b) estimates that a baseline funding uplift in NSW would cost an additional \$74.7 million a year in 2025-26, for the following specific programs:

- Specialist women's homelessness services and refuges (excluding funding under the Core and Cluster program)
- Domestic Violence Response Enhancement
- Specialist Workers for Children and Young People in refuges

This funding increase has been calculated on the understanding that the NSW Government has committed about \$133.5 million in funding for these programs in 2024-25 (DCJ 2024). The estimates include a 50% baseline funding increase and allowance for inflation and population growth over time.¹

The additional funding amounts for each of these programs have also been adjusted to allow for inflation and population growth (applied to the total funding amount for each program).

Program	Current funding allocated for 2024-25\$m ²	Additional funding needed in 2025-26\$m
Women's refuges	110.4	61.8
Domestic Violence Response Enhancement	11.6	6.5
Specialist Workers for Children and Young People	11.5	6.4
Total	133.5	74.7

Fiscal impact	2025-26\$m	2026-27\$m	2027-28\$m	2028-29\$m
Total baseline funding	208.2	216.3	224.5	232.9

¹ Assuming 2.5 per cent annual inflation, plus population growth based on projections using medium assumptions from Australian Bureau of Statistics (2023), "Population Projections, Australia", Available: <https://www.abs.gov.au/statistics/people/population/population-projections-australia/latest-release>

² Based on data provided by DCJ. Where a funding amounts for 2024-25 were not provided, we have assumed that funding would remain at 2023-24 levels.

Increase relative to 2024-25	74.7	82.8	91.0	99.4
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Increased cost to deliver services in regional and remote NSW

SHSs are significantly more costly to deliver in regional and remote parts of NSW. The cost challenges faced by services operating outside of major cities include:

- Significantly higher rates of DFV – compared to major cities, per-capita rates of domestic violence related assaults recorded by Police are six times higher in remote areas ³
- Greater difficulty attracting and retaining staff on the wages services can afford to offer,
- Higher travel costs, including direct expenses (e.g. fuel) and staff time, with less time available for frontline service delivery due to time spent travelling, and
- Higher brokerage costs to support clients to access specialist services, especially when they need to travel for several hours to the nearest regional centre.

Given the increased service delivery costs and greater incidence of DFV in regional and remote areas of NSW, Impact Economics and Policy (2024b) estimates that services in inner and outer regional areas require about two to four times the funding of services in major cities (per person in the general population). Services in remote and very remote areas require nearly nine times the funding to operate sustainably and to meet demand.

Regional service delivery costs – multiple of costs in major cities, per head of general population

Remoteness level	Cost of delivering a given level of services	Greater demand for services	Combined impact – regional loadings
Inner regional	1.16x	1.90x	2.21x
Outer regional	1.16x	3.16x	3.66x
Remote	1.20x	7.45x	8.94x
Very remote	1.20x	7.45x	8.94x

All SHSs operating in regional and remote areas should receive a loading in their funding arrangements which reflects the combined impact shown in the table above. This loading should be applied based on the total population in the service's catchment area.

While it is unclear how the significant cost differences between metro and regional services are currently factored into funding arrangements, DVNSW recommends that all SHSs operating in regional and remote parts of NSW be provided with additional funding beyond base funding to account for the higher costs they face.

Recommendation 3: Provide a loading to all specialist homelessness services operating in regional, rural and remote locations in NSW

Increased cost to deliver services to people from migrant and refugee backgrounds

An estimated one in three migrant and refugee women in Australia have experienced DFV – compared with one in four in the general population (Segrave, Wickes & Keel 2021). These women and children face unique challenges that make it more difficult to escape violence or reach out for help, including language and cultural barriers, lack of culturally appropriate services, and limited social support.

³ Impact Economics and Policy analysis of [BOSCAR domestic violence statistics](#) by Local Government Area, using remoteness classifications from the NSW Local Government Grants Commission.

Additionally, people on temporary visas in Australia (e.g. people seeking asylum, students and temporary workers) often have limited social support networks in Australia and lack access to welfare services like Centrelink and Medicare, which excludes them from mainstream services.

There is significant unmet demand for support among migrant and refugee women and children from non-English speaking backgrounds (NESB) escaping family violence. While specialist DFV refuges are well placed to provide appropriate support, insufficient funding limits their ability to hire appropriately trained specialist staff and deliver essential services. Increased funding for mainstream services to support migrant and refugee clients from NESB would enable greater outreach and culturally appropriate services, including casework, interpreters and community education.

Specialist DFV support for migrant and refugee NESB populations is also more complex and costly to deliver than general DFV assistance due to factors such as:

- Greater complexity of casework, requiring more time per client.
- Higher accommodation costs (for SHSs), as affordable medium-to-long-term accommodation is harder to find and so clients stay longer.
- Almost all clients have children who also require support.
- Clients generally need more intensive casework to access health, legal and consular services.
- Clients may not have access to income or income support to pay for necessities (such as food or schooling), which requires greater brokerage.

Services estimate that providing specialist DFV refuge support to migrant and refugee NESB populations who have arrived in Australia in the last ten years can cost around 1.5 as much as non-migrant and refugee clients. Additionally, people seeking asylum or temporary visa holders, who make up an estimated one third to two thirds of all NESB migrant and refugee clients, can cost up to twice as much to support as permanent residents (Impact Economics and Policy 2024b).

Impact Economics and Policy (2024b) estimates that providing specialist DFV refuge services for migrant and refugee NESB populations costs roughly 2.2 times more than mainstream DFV services.

In NSW, roughly 23% of the population – more than one in five people – were born overseas in a majority non-English speaking country. Just over a third of these migrants arrived in Australia in the 10 years prior to the 2021 Census (ABS 2021). While data on temporary visa holders is limited, estimates indicate that there are nearly 500,000 temporary visa holders (excluding New Zealand citizens) living in NSW (with 85 per cent of these in Sydney), representing a further six per cent of the population (ABS 2023b).

In total, this means about 12% of the population is either a recent migrant from a non-English speaking background and/or temporary visa holder (Impact Economics and Policy 2024b).

Specialist migrant/refugee services – multiple of costs of mainstream services, per head of general population		
Sub-group	Population share	Cost loadings
NESB migrants (permanent resident or citizen) who arrived in Australia in the last 10 years	6 per cent	1.5x
Temporary visa holders (excluding New Zealand citizens)	6 per cent	3.0x
Combined	12 per cent	2.2x

The loadings to provide specialist services to migrant and refugee NESB clients have been estimated with the assumption that services receive a part of total baseline funding based on their share of the population in each region. In addition, a cost uplift has been added which reflects the costs of service delivery for temporary visa holders at 3.0 times the general cost, and service delivery for other migrant and refugee NESB populations at 1.5 times the general cost.

Introducing a loading for women's refuges supporting migrant and refugee NESB clients will enable specialist DFV services to better meet their needs.

Recommendation 4: Provide a loading to women's refuges to improve support for migrant and refugee victim-survivors of domestic and family violence from non-English speaking backgrounds.

Homelessness is not repeated: when homelessness does occur, people do not experience multiple episodes of homelessness

To ensure homelessness is not repeated and achieve target 3.3: *People have access to housing that meets their changing needs across their lifespan*, the Strategy must address the unique and specific barriers faced by priority groups at greater risk of repeat homelessness. These include Aboriginal people, older women, people in regional and remote areas, women with disability, and women on temporary visas. Understanding people's living arrangements and planning for and providing diverse types and locations of housing in NSW is crucial to meet the needs of priority cohorts.

Investing in flexible accommodation models that address the specific needs of marginalised communities will support victim-survivors of DFV through crisis and into more stable, long-term housing. Providing wrap-around support alongside housing is essential to prevent multiple episodes of homelessness for some cohorts. Increased funding for housing supply alone is insufficient and must be accompanied by equivalent funding for wrap-around support services.

The inclusion of lived expertise throughout the homelessness service system is vital to ensuring the responses are appropriate, person-centred and trauma-informed.

A direct quote from a members of our Lived expertise advisory committee:

“The longer people are homeless the more likely they are to experience trauma and more likely they are to stay homeless.”

Recommendation 5: Invest in flexible models of housing that address the specific needs of marginalised communities with commensurate support funding.

The specific needs of marginalised cohorts are detailed below.

Aboriginal women and children

We welcome the inclusion of the principle *Aboriginal expertise and leadership are respected*, however, further detail is required regarding what will this mean in practice and how it will be implemented to ensure it is not tokenistic. Leadership from Aboriginal organisations and communities must be embedded throughout the Strategy, including in recommissioning, service design and delivery, resource allocation, and future investment over the life of the Strategy.

The DVNSW Aboriginal Women's Steering Committee has advised that consultation is insufficient - they need to make their own decisions for their own communities. Therefore, we welcome the inclusion of a standalone, Aboriginal led Action Plan in the Strategy.

DFV and correlating homelessness disproportionately affects Aboriginal communities and must be viewed within the historical context of colonisation; dispossession, loss of culture, the breakdown of kinship systems and of traditional law, racism, and government policies of forced removal of children (the Stolen Generations). Aboriginal people make up one in three clients seeking SHS assistance (AIHW, 2024).

Factors such as poor housing or overcrowding, racial discrimination, poverty and unemployment contribute to the high rates of homelessness experienced by Aboriginal and Torres Strait Islander communities (AIHW, 2019). Acute shortages in crisis, transitional and long-term housing - particularly in regional areas - mean that Aboriginal women often experience repeated abuse and further periods of homelessness.

Reforming the homelessness service system in NSW: Improving responses for victim-survivors of domestic and family violence

Under the National Housing and Homelessness Agreement (NHHA), NSW has shown little to no improvement, or even negative changes, in housing outcomes for Aboriginal and Torres Strait Islander people (Australian Productivity Commission, 2021).

Reliance on social housing is markedly high for Aboriginal women, due to their exclusion from the private rental market. This exclusion is compounded by intersectional factors that create significant disadvantage for Indigenous women, such as racism, poverty and gender-based discrimination (Cripps and Habibis, 2019).

In recent decades, both state and federal governments have tended to incorporate services for Aboriginal people experiencing homelessness into mainstream services and systems. However, it is essential that the Strategy prioritises the needs of Aboriginal women and respects their housing and support preferences.

Aboriginal housing must be appropriately located based on need, offering flexibility to accommodate larger multigenerational families, especially where kinship models mean there may be additional children living in the home. Crisis accommodation responses for Aboriginal women and children should also be flexible, offering options to relocate if they want to leave community, or providing wrap-around support to stay, rather than being forced into whatever options are available.

Trust and access are higher for Aboriginal community-controlled organisations, but some Aboriginal women may prefer mainstream support services due to privacy concerns within their community. Therefore, it is essential that mainstream organisations offer culturally safe support. The NSW government should increase the number of Aboriginal community-controlled organisations and increase funding to Aboriginal specialist DFV services to address the high levels of DFV and homelessness in Aboriginal communities.

Aboriginal community-controlled organisations have been delivering holistic support to women and children and whole-of-family for years, despite the constraints of the Western system and restrictive funding models. Given that DFV and homelessness are influenced by many intersecting factors, it is vital to provide support that addresses all of a person's presenting needs. Mainstream services could benefit from adopting a similar flexible, holistic approach, with the right funding model. This approach, while beneficial for Aboriginal women and children, would improve outcomes for the wider population.

Recommendation 6: Increase the number of Aboriginal Community Controlled Organisations (ACCO) and Aboriginal Community Housing Providers (ACHPs) and increase funding to Aboriginal specialist DFV services to address the high rates of DFV and homelessness.

Recommendation 7: Embed mandatory cultural awareness training and cultural safety frameworks within all homeless and housing organisations, as well as other responders including health and mental health services and child protection.

Recommendation 8: Fund holistic models of support including whole-of-family work and remove restrictive funding constraints for Aboriginal and mainstream DFV and homelessness services.

Older women

Women over 55 are the fastest growing cohort experiencing homelessness across Australia, increased by 6.6% since the previous Census (ABS, 2021). The number of women between 55–74 years old seeking support from homelessness services has increased by 55% over the last decade. This is often as a result of DFV, pay inequity, little to no superannuation or savings, divorce, and time taken out of the workforce as unpaid carers. In NSW, 110,000 women aged over 45 years were estimated to be at risk of homelessness (Lester & Faulkner 2020). These figures pre-date the cost of living crisis, which has led to Reforming the homelessness service system in NSW: Improving responses for victim-survivors of domestic and family violence

financial stress, rental price increases and exacerbated homelessness. These statistics are alarming and highlight the urgent need for crisis and long-term housing options for older women.

To address this current housing emergency, the NSW government must invest in early intervention support to address the needs of older women at risk of homelessness, before they reach crisis point. Investing in early intervention services for older people that provide brokerage and tenancy maintenance would save the government from the higher costs of responding to homelessness later (Thredgold, Beer, Zufferey, Peters, and Spinney, 2019).

Direct quote from a member of the DVNSW Lived Expertise Policy Advisory Committee:

“Women over 55 lose faith in the homelessness system, we think what’s the point and we make do. I am lucky as I have income coming in, but I can’t get medical attention. All of the systems feed into each other. Why is it I am in this state? I have spent years looking after my children and now my ability to live a long life is limited because I can’t get the housing or health support I need.”

The Home at Last program in Victoria supports older people to access secure, affordable and appropriate housing. Run by the Housing for the Aged Action Group (HAAG), it is a free service offering confidential advice, support and advocacy for people aged 50 years and older to find housing (HAAG, n.d.). The program provides tailored housing information, assistance with housing applications, support during the move, help with settling into a new home, and referrals into health, aged care, and other supports.

A key component of the service is its focus on early intervention, which involves working directly with communities and via peer educators to identify people at risk of homelessness before they reach a crisis point. Home at Last is available to any older person in Victoria on a low income and has successfully assisted over 1,000 older people into permanent and secure housing since 2012. There is no equivalent program in NSW.

An assessment of the service model by accounting firm Ernst & Young found a benefit cost ratio of 2.3, meaning every dollar spent generates at least \$2.30 in societal value (Ernst and Young 2021). The social benefits of this model are also clear: it provides older people with the wrap around supports they need to maintain their tenancies and reduces pressures on social systems. Ultimately, Home at Last delivers long-term benefits for the Australian economy and society. Given its success in helping older people navigate the complex housing system and saving government significant costs, the Home at Last model should be adopted and adapted for NSW as recommended by the Ageing on the Edge NSW Forum, 2021.

Recommendation 9: Fund a specialist older person’s housing information and support service that comprises both an early intervention and crisis response, similar to the Housing for the Aged Action Group ‘Home at Last’ model in Victoria.

Remote rural and regional communities

The housing crisis in NSW regional communities is at tipping point. There is an acute shortage of crisis, transitional, and long-term housing in regional and remote areas, forcing many woman and children to return to unsafe and violent home environments. Social housing waitlists are now similar to those of the city. The COVID-19 and migration of people from cities to regional areas have worsened the lack of affordable accommodation across the state. Many holiday homes sit empty or are rented out via platforms like Airbnb, as landlords opt to rent to affluent holiday-goers rather than people in need. Rental prices continue to rise as demand exceeds supply, and climate change and natural disasters, such as bushfires and floods, have further limited housing availability.

Reforming the homelessness service system in NSW: Improving responses for victim-survivors of domestic and family violence

At the DVNSW Conference Regional Breakfast in September 2024, members spoke of the lack of support services in very remote areas and the long waitlists for existing services. Many victim-survivors are in dire situations, and even those fortunate enough to secure a place in refuge face a lack of exit pathways to stable accommodation. As a result, many must choose between returning to a perpetrator, entering often inappropriate and unsafe temporary accommodation (TA), or becoming homeless. Some victim-survivors are caught in a vicious cycle of moving from refuge to refuge or TA to TA, often travelling long distances and losing access to their local communities and support networks.

Regional communities urgently need housing solutions and safe at home programs to support victim-survivors to stay safely in their home. These housing solutions must be long-term, fit for purpose, safe and affordable, with specific regional, rural, and remote allocation.

Recommendation 10: Implement needs-based funding models for crisis, transitional and social housing in regional and remote NSW, rather than allocating funds solely on population size.

Women with disability

Women with disability experience significantly higher levels of all forms of violence, including DFV (Frawley, Dyson, Robinson, Dixon, 2015). Women with disability are almost twice as likely as women without disability to have experienced physical or sexual violence by a cohabiting partner within a 12-month period (2.55 compared with 1.3%) (ABS 2021). Women with disability often perceive DFV services as unsafe, unapproachable and inaccessible (Healey 2013). They fear these services will discriminate against them based on their disability, which can prevent them from seeking support and may increase their risk of homelessness.

Two members of the DVNSW Lived Expertise Policy Advisory Committee shared their experiences:

“My file noted I had a mental health disability. I was offered a social housing property purpose built and fitted with disability access bathroom and kitchen. I rejected the offer of housing, as I did not require the physical disability access. The department of housing took me off the waitlist. I couldn’t believe the incompetence. I was finally able to rectify the mistake after escalating the issue and was placed back on the waitlist. But it caused me so much stress and anxiety. This decision should not have been made in the first place – pure incompetence and illogical decision making.”

“I live with a physical disability and was residing in a women’s DFV refuge. The room I was allocated was upstairs, but because I could not climb the stairs, I slept on the couch downstairs in the living room. One day refuge staff took my clothes off the clothes line outside and took them upstairs and told me I had to get them. I made a complaint to the human rights commission. The refuge was given a directive to support me, but of course I couldn’t stay after that.”

These examples highlight the serious challenges faced by the SHS and broader housing system in adequately and appropriately meeting the needs of people with disability. Disability advocates also report that hundreds of purpose-built homes for the National Disability Insurance Scheme (NDIS) participants sit vacant across the country, leaving some people to spend weeks and months in hospital while waiting for approval to move in. The NDIS should remove the red tape on purpose-built accommodation to ensure people with disability have access to the housing solutions they need.

Recommendation 11: Make all types of housing – temporary, crisis, transitional and social – fully accessible, including wheelchair access, adjustable kitchen benchtops, and flexible design. Retrofit existing housing to meet accessibility standards.

Women on temporary visas

Temporary visas holders do not have access to temporary accommodation or many other housing supports. While we welcome the inclusion of *Housing as a human right* in the principles of the Strategy, the current SHS system does not reflect this principle for women on temporary visas. *Housing as a human right* requires that all women and children, regardless of their immigration status, should have access to safe accommodation, support, and pathways to independence when leaving DFV.

In NSW, over 25% of people killed in the context of domestic violence between 2000 – 2022 were born outside the country, with 12.8% holding temporary visas at the time of their death (DVRT, 2024).

Women on temporary visas often face long stays in crisis accommodation due to a lack of exit pathways. This creates further strain on an already overburdened system. A 2024 survey conducted by DVNSW with member services found that the average stay for a woman on a temporary visa in a refuge was over 12 months, with nearly 60% of women staying longer than six months, and some remaining for up to four years or until they could secure permanent residency. This survey data will be published in a DVNSW report in March 2025.

Services are under pressure to move victim-survivors out of refuge accommodation within a three-month timeframe set by DCJ. However, this is not feasible for women on temporary visas due to ineligibility for social support payments, exclusion from the broader housing system, and limited or no income. This three-month support period forces refuges to turn away women on temporary visas and prioritise other clients, leaving women on temporary visas without access to essential safety and support. This is a human rights violation and conflicts with the Homelessness Strategy guiding principle, *Housing is a human right*. The current model, designed to ensure swift transitions out of refuge accommodation, does not account for the unique circumstances of women on temporary visas and needs to be reconsidered to address their prolonged need for support.

To support long-term stability and independence for victim-survivors on temporary visas, it is essential to create pathways to medium and long-term safe and affordable housing options. This will help women on temporary visas to transition from crisis accommodation into secure housing more quickly, rather than remain in limbo for extended periods or until they obtain a permanent visa. Increased access to social and affordable housing will also alleviate the bottle neck in refuges caused by the lack of exit pathways.

Women on temporary visas must also have access to temporary accommodation. While only a stopgap solution, temporary accommodation plays a crucial role in the homelessness service system for women experiencing DFV who struggle to secure a vacancy in a crisis refuge.

In lieu of extending eligibility for victim-survivors on temporary visas to the broader housing and homelessness system, at a minimum the NSW government should extend eligibility to parents on temporary visas, who have children that are Australian citizens.

Recommendation 12: Extend eligibility for women on temporary visas to the broader NSW housing and homelessness system, including access to social and affordable housing and temporary accommodation.

People with lived expertise should inform and shape practice

The inclusion of the principle, *Person-centred principles are embedded in policy and practice*, is particularly important when considering responding to victim-survivors of DFV, given the complex and varying presentations of trauma.

We spoke with two members of the DVNSW Lived Experience Policy Advisory Committee (LEPAC) in relation to their experiences of being homeless and about the Draft Strategy more broadly. Two key themes came up repeatedly:

- The system is failing to adequately and appropriately respond to the needs of victim-survivors experiencing homelessness.
- People with lived expertise are underutilised in the design of the SHS and housing systems.

The below statement is a direct quote from a DVNSW LEPAC member:

“Staff at the housing office have no idea about trauma-informed support, so they treat you like dirt. Clients are often visibly upset and traumatised. They put you in a box, one size will fit everyone. They are not compassionate. Staff need to be competent, responsible and accountable.”

It is critical that victim-survivors of DFV facing homelessness receive a DFV-informed and trauma-informed response at point of contact with Homes NSW, whether in-person at the Housing office or on the Link2Home phone line. Homes NSW staff must be able to appropriately respond to disclosure of DFV. A poor response may result in a victim-survivor returning to a violent situation and not reaching out for support again.

Recommendation 13: Provide ongoing DFV and trauma-informed training for Homes NSW staff, and prioritise consultation and co-design opportunities for people with lived expertise to improve customer service responses to people experiencing homelessness.

The below statement is a direct quote from a DVNSW LEPAC member:

“We’re underutilised. Our skill sets are underestimated. We know what needs to be done because we have lived it. We need to be involved from the beginning in the design of the system, not consulted at the end.”

We welcome the inclusion of *People with lived experience inform service design*, as a guiding principle in the Strategy and the several references to consulting with people with lived expertise to inform the Strategy. However, building the capacity and capability of people with lived experience to participate in the design and delivery of the Strategy and build capacity of the government to include lived experience in governance, policymaking and operations can only happen in a meaningful way through a formal advisory group. We therefore recommend implementing a lived experience advisory group to provide expert advice on all aspects of the Strategy.

Recommendation 14: Implement a lived expertise advisory group to inform the design and delivery of homelessness policy, programs, service specifications and delivery across the life of the Strategy.

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